

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

<b>In the Matter of</b>  <b>CAH Acquisition Company #1, LLC d/b/a Washington County Hospital</b>	<b>Case No. 19-00730-5-JNC</b>  <b>Chapter 11</b>
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**BANKRUPTCY ADMINISTRATOR’S OBJECTION TO INITIAL APPLICATION BY  
GRANT THORNTON LLP AS FINANCIAL CONSULTANT FOR THE TRUSTEE  
FOR THE ALLOWANCE OF INTERIM COMPENSATION AND REIMBURSEMENT  
OF EXPENSES [FEBRUARY 19, 2019 TO MAY 31, 2019]**

Now comes the Bankruptcy Administrator for the Eastern District of North Carolina and files this objection to the Initial Application by Grant Thornton LLP (“GT”) as Financial Consultant for the Trustee for the Allowance of Interim Compensation and Reimbursement of Expenses [February 19, 2019 To May 31, 2019] and in support shows the court the following:

1. This case was filed as an involuntary chapter 7 on February 19, 2019. The Trustee filed a motion to employ GT as financial consultant on April 18, 2019 and the court approved the employment (effective as of February 19, 2019) on May 9, 2019.

2. The order incorporated the Trustee’s employment motion by reference. The motion describes the services to be provided by GT in this case. “Working under the direction of the Trustee and collaboratively with the Trustee’s counsel and other professionals,” the firm was employed to provide the services set forth on Exhibit A. These services have been split into two categories-Financial Consulting and Forensic Technology. GT seeks payment of \$121,250.06 in professional fees and \$6,013.27 in expenses. It has voluntarily reduced its fees by \$38,081.00.

3. In reviewing the application, the BA has identified time entries of concern which equal \$42,134.00. GT has voluntarily reduced its fee by \$38,081.00 which is a difference of \$4,053.00 from the BA’s calculations. These time entries are identified on the attached Exhibit B. The BA believes that this additional reduction is well founded and would support a fee reduction in this amount in addition to the voluntary reduction already made by GT.

4. GT asks for reimbursement of expenses arising from travel related to the case. The expenses and travel time billed in this and the other cases is allocated by calculating the percentage of each consultant’s non-travel hours billed to the particular hospital. Based on this approach, the firm billed \$8,804 in travel time to the case. The BA questions the application of this approach in this particular case as some of the non-technology travel involved travel to the hospitals in Oklahoma and Kansas. The BA requests that the reimbursement and/or payment for

travel be considered in light of its purpose. While some of the travel entries describe the purpose of the trip, many others (for example, “travel from Winston-Salem to Charlotte”) are unclear. The BA requests that GT provide an explanation as to the trips taken, the professionals who traveled and the purpose of the trip. In addition, GT is billing for trips by multiple professionals from New York and Charlotte to meet with the Trustee in Winston-Salem. In order to keep the expense of these meetings to a minimum, the parties should consider using telephone or video conferences rather than in person meetings unless that is required by the circumstances.

Wherefore the BA requests that the fee requested be reduced in the amount of \$4,053.00 and the expense reimbursement be denied until the concerns set forth above are addressed and such other and further relief as the court deems just and proper.

Respectfully submitted, this the 16<sup>th</sup> day of August 2019.

/s/ Marjorie K. Lynch  
Marjorie K. Lynch  
Bankruptcy Administrator  
434 Fayetteville Street, Suite 640  
Raleigh, North Carolina 27601  
(919) 334-3885  
[Marjorie\\_lynch@nceba.uscourts.gov](mailto:Marjorie_lynch@nceba.uscourts.gov)  
State Bar No. 13594

**CERTIFICATE OF SERVICE**

I, Marjorie K. Lynch, of 434 Fayetteville Street, Suite 640, Raleigh, North Carolina, 27601, certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age.

That on this day, I served copies of the foregoing document electronically on the following:

Thomas W. Waldrep  
Trustee

Jennifer Lyday  
Waldrep LLP  
Attorney for Trustee

Rebecca Redwine  
Hendren Redwine and Malone  
Attorney for Trustee

Robert Vanderbeek  
Managing Director  
Grant Thornton LLP

I certify under penalty of perjury that the foregoing is true and correct.

Dated this the 16th day of August 2019.

/s/ Marjorie K. Lynch  
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Bankruptcy Administrator  
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